

REMARKS

This application has been reviewed in light of the Office Action dated December 9, 2005. In view of the foregoing amendments and the following remarks, favorable reconsideration and withdrawal of the rejections set forth in the Office Action are respectfully requested.

Claims 1-22 are pending. Claims 1-3, 8-10, and 15-18 have been amended. Claims 19-22 have been added. Support for the new claims and claim changes can be found in the original disclosure, and therefore no new matter has been added. Claims 1, 8 and 15-18 are in independent form.

Claims 17 and 18 have been rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. Without conceding the propriety of this rejection, Applicant has amended Claims 17 and 18 to be directed to a computer readable medium storing a control program. Reconsideration and withdrawal of the §101 rejection are requested.

Claims 1-3, 8-10 and 15-18 have been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,560,575 (*Keiller*). Claim 4-7 and 11-14 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Keiller* in view of U.S. Patent No. 6,556,841 (*Yu*). These rejections are traversed.

Keiller relates to a speech processing apparatus which is trained by generating word models. A word model is generated by having an operator utter two or more training examples, which are compared and checked for consistency. When it is determined that the two (or more) training examples are consistent, the corresponding word model is generated. The training examples are spoken utterances.

It is respectfully submitted, however, that the features of *Keiller* noted by the Examiner do not correspond to the features of the present invention, as discussed below. Referring to Applicant's claim 1, for example, the apparatus is for recording speech to be used as learning data for recognizing input speech. Storage means stores a recording character string indicating a sentence to be recorded and recognition means recognizes input speech for use as the learning data so as to obtain a recognized character string corresponding to the stored recording character string. Determination means compares a pattern of the recognized character string with a pattern of the recording character string stored in the storage means so as to obtain a matching rate therebetween, and determines whether the matching rate exceeds a predetermined level. Recording means records the input speech as the learning data for recognizing input speech when determined that the matching rate exceeds the predetermined level.

The present invention is directed to increasing the quality of the acoustic model by having such a structure, not to recognizing the input utterance, which is not applicable to creation of the acoustic model. That is, the various elements of Claim 1 are not for recognizing input speech, but rather for recording input speech as learning data used in recognizing input speech. Such a process can be termed "enrollment." Enrollment can be used in a typical voice command control system (e.g., a car navigation system) so that the speech recognition can be accurate. That is, the enrollment can be used to create an acoustic model used in the speech recognition.

While *Keiller* does describe training in order to generate word models, which word models are used to compare input utterance from a user in order to provide a recognition result, such training clearly differs from that of the present invention. For example, *Keiller* does not disclose or suggest storage means for storing a recording character string indicating a sentence to be recorded. Rather, the description at col. 16, lines 16-19 of *Keiller* refers to operation of an apparatus after it has been trained, i.e., refers to operation of an apparatus as a speech recognition apparatus to perform speech recognition on unknown speech. Accordingly, this feature of *Keiller* cannot be deemed to teach or suggest the subject matter of Claim 1. The stored word models cannot be considered a recording character string indicating a sentence to be recorded. Likewise, *Keiller* does not compare a pattern of a recognized character string (corresponding to the stored recording character string) with a pattern of the recording character string stored in the storage means so as to obtain a matching rate therebetween. The recognition performed in *Keiller* is used in speech recognition, not in enrollment for the acoustic model.

Thus, *Keiller* fails to disclose or suggest important features of the present invention recited in independent Claim 1. *Keiller* is also not believed to disclose or suggest the determination step of Claim 8 or the second program code unit of Claim 17, which corresponds to the determination means of Claim 1.

Regarding Claims 15, 16 and 18, *Keiller* is not believed to disclose or suggest recognizing input speech, to be used as learning data, so as to obtain a recognized character string (pattern), comparing a pattern of the recognized character string with the pattern of a recording character string so as to obtain a matching rate therebetween, and

recording the input speech as the learning data for recognizing speech when determined that the matching rate exceeds the predetermined level.

Thus, *Keiller* fails to disclose or suggest important features of the present invention recited in the remaining independent claims.

Yu is directed to methods of spell checking and correcting of character strings input into a mobile communication device, which typically has a small keypad that increases the likelihood of errors made by users in typing in words. According to *Yu*, words typed in by a user are (spell-)checked by comparison to entries in a dictionary (pre-stored in the device), and corrected according to a correction algorithm involving character substitution and repeated dictionary look-up. *Yu* does not mention training of a speech recognition apparatus. *Yu* is not concerned with, and does not require, such training, because the *Yu* device does not perform speech recognition and it employs a built-in dictionary that satisfies its (spell-)checking/correction requirements. Accordingly, nothing is seen in *Yu* (or in any combination of *Keiller* and *Yu*, even if it were deemed permissible to combine those two documents) that would teach or suggest Applicant's claimed invention.

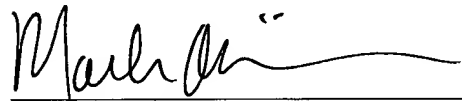
Thus, the independent claims are believed to be patentable over the citations of record.

The other claims in this application are each dependent from one or another of the independent claims discussed above and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual consideration or reconsideration, as the case may be, of the patentability of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicant respectfully requests favorable reconsideration and early passage to issue of the present application.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark A. Williamson", written over a horizontal line.

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